

CLIFTON BUDD & DeMARIA, LLP
ATTORNEYS AT LAW

THE EMPIRE STATE BUILDING
350 FIFTH AVENUE, 61ST FLOOR
NEW YORK, NY 10118

TEL 212.687.7410
FAX 212.687.3285
WWW.CBDM.COM

August 19, 2025

VIA ECF

Honorable Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1960
New York, NY 10007

Granted.

SO ORDERED:

8/19/2025



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *M. Paz, et al., v. Elio&Sons1 LLC, et al.*,
Case No. 1:25-cv-03381-JAV-RWL

Dear Judge Lehrburger:

This firm represents respondents the Morgan Group, LLC (the "Morgan Group"), Scott Morgan and Ryan Morgan (collectively, the "Morgan Group Defendants") in the above-referenced proceeding. Pursuant to Sections I.A and I.D of Your Honor's Individual Practices in Civil Cases, we write to respectfully request a second adjournment of the Initial Pretrial Conference currently set for Monday, August 25, 2025 at 11:30 am before Your Honor, for another date and time at the Court's earliest convenience.

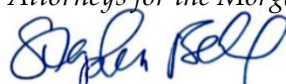
There has been one prior request for an adjournment of this conference, which was originally scheduled for July 21, 2025. *See* Dkts. 18, 21, 22. We have conferred with counsel for Plaintiff, who consents to this application. The only other scheduled dates in this matter would be affected by the requested extension would be the Parties' deadline to complete and jointly file a proposed Civil Case Management Plan and Scheduling Order, which will be due one week prior to the hearing, if rescheduled. The Parties have conferred and jointly propose the following dates when counsel will be available for the conference: Thursday, September 18; Friday, September 19; Friday, September 26; and Thursday, September 25 (after 1:00 pm only).

To date, there has been no appearance from defendants Elio&Sons1 LLC, Premtim Gjonbalic or Donika Islami. Prior to the rescheduled conference, the Parties hope to confirm an appearance for these defendants, or request a certificate of default, so that it can be determined if they will participate in these proceedings.

We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DeMARIA, LLP
Attorneys for the Morgan Group Defendants



By: Stephen P. Pischl

CLIFTON BUDD & DEMARIA, LLP

Hon. Robert W. Lehrburger, U.S.M.J.
August 19, 2025
Page 2

cc: **VIA ECF**
LAW OFFICE OF PETER A. ROMERO, PLLC
David D. Barnhorn, Counsel
Attorneys for the Plaintiff